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June 28, 2021

**BY ECF:**

Hon. Alvin K. Hellerstein  
District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Courtroom 14D  
New York, NY 10007

Defendant's request is denied without prejudice to re-submission with a more definite schedule of notice to the probation officer, times and dates of curfew, and the specific need for curfew.

So ordered,  
/s/ Alvin K. Hellerstein  
Alvin K. Hellerstein  
6/29/21

RE: United States v. Daniel Torres  
Case No.: 21-cr-00132- 2 (AKH)  
Request for Modification of Release Conditions

Dear Judge Hellerstein:

Please be advised that I represent Mr. Daniel Torres. With prior approval from pretrial services, and the Government, we respectfully submit this letter requesting for a modification of Mr. Torres' release conditions.

Specifically, Mr. Torres requests that Your Honor vacate the previous ordered condition that he be subject to home confinement in Your Honor's so-ordered March 11, 2021 appearance bond (ECF No. 41) and in lieu order a seven (7) day curfew at the discretion of pretrial services which will allow Mr. Torres to work via on-demand staffing websites/applications.

Thank you for your consideration.

Sincerely,  
**Spodek Law Group P.C.**  
/S/ Todd A. Spodek

TAS/az

cc: All Counsel (By ECF)  
Pretrial Officer Vincent Adams (By Email)